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9 Attorneys for United States of America

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA

12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA,) CASE NO. CR 18-0310 EMC
14 Plaintiff,)
15) STIPULATION RE: FOREIGN DEPOSITION AND
16 v.) ORDER [PROPOSED]
17 LAWRENCE GERRANS,)
18 Defendant.)
19 _____)

20 Plaintiff, the United States of America, and defendant, Lawrence Gerrans, respectfully advise the
21 Court that Santa Rita jail has requested a court order to facilitate defendant's telephone participation in
22 the Rule 15 deposition of witness Ehran Gunday. This foreign deposition is scheduled to take place at
23 10:00 a.m. on November 14 and 15, 2019 the American Embassy in Athens, Greece. Athens, Greece is
24 ten hours ahead of Pacific Standard Time. Accordingly, Santa Rita jail will need to have the defendant
25 available from approximately 11:00 p.m. on November 13, 2019 through noon on November 14, 2019
26 and, if necessary, the same time-frame for November 15, 2019. The parties hereby stipulate that
27 defendant's participation by telephone in the Rule 15 foreign deposition from midnight on November
28 13, 2019 through noon on November 14, 2019 and, if necessary, from midnight on November 14, 2019

STIP AND ORDER
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1 through noon on November 15, 2019, is an exigent circumstance. Thus, the parties jointly request the
2 Court to order Santa Rita jail personnel to have the defendant available by telephone from 11:00 p.m. on
3 November 13, 2019 through noon on November 14, 2019 and, if necessary, from 11:00 p.m. on
4 November 14, 2019 through noon on November 15, 2019. The parties stipulate and agree that
5 defendant's telephone participation in the foreign deposition is an exigent circumstance that will require
6 the jail to wake defendant before 5:00 a.m. and may require lights to be turned on after 11:00 p.m.

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8 DATED: November 6, 2019

Respectfully submitted,

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DAVID L. ANDERSON
United States Attorney

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/s/
ROBIN L. HARRIS
Assistant United States Attorney

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/s/
BRIAN GETZ
Attorney for Defendant

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ORDER

16 The parties having so stipulated and GOOD CAUSE APPEARING, IT IS HEREBY ORDERED,
17 that, for the Rule 15 deposition of witness Ehran Gunday, Santa Rita jail will provide defendant with
18 telephone access to the deposition from 11:00 p.m. on November 13, 2019 through noon on November
19 14, 2019 and, if necessary, from 11:00 p.m. on November 14, 2019 through noon on November 15,
20 2019. IT IS FURTHER ORDERED that to accommodate the aforementioned time periods, Santa Rita
21 jail is permitted to wake the defendant before 5:00 a.m. and, if necessary, to turn on the lights after
22 11:00 p.m. for the limited purpose of facilitating defendant's telephone participation in the Rule 15
23 deposition.

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IT IS SO ORDERED.

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HON. EDWARD M. CHEN
United States District Court Judge

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